

DAWN M. FLORIO LAW FIRM, PLLC

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MEMO ENDORSED

June 14, 2022

VIA ECF

Honorable Edgardo Ramos United States District Judge Thurgood Marshall United State Courthouse 40 Foley Square New York, New York 10007

Sentencing is adjourned to July 28, 2022 at 3:30 p.m. SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 6/17/2022 New York, New York

RE: United States v. Thomas Santos 1:20-CR-00481-ER-1

Honorable Ramos;

I, Dawn M. Florio, attorney at law, represent Thomas Santos on the above case matter dated for June 22, 2022 @ 330pm for sentencing.

I am currently on a 2019 Murder Trial on People v. Dushon Foster in front of Hon. McCarty, which is expected to last 4 weeks. Our Sentencing Memo was due June 8 but we are requesting additional time to complete our Sentencing Memo as well as time for the Government to respond with theirs. I have spoken to AUSA Jarrod Schaeffer and AUSA Elizabeth Espinosa and they have consented to a 30-day adjournment for mid to late July. I apologize to the court and all parties for the inconvenience this will cause and exclude time under the Speedy Trial Act until a date has been selected. I am requesting that this application be acknowledged and considered.

Should your Honor have any questions or concerns, please feel free to contact my office at your earliest convenience.

Sincerely,

Dawn M. Florio

Dawn M. Florio, Esq. *Attorney for Thomas Santos*

CC: All Counsel